

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FRASER CONSTRUCTION COMPANY,
INC., individually and on behalf of all
others similarly situated,

Plaintiff,

v.

CEDAR SHAKE & SHINGLE BUREAU,
a Washington nonprofit corporation;
WALDUN FOREST PRODUCTS, LTD, a
British Columbia corporation; ANBROOK
INDUSTRIES LTD, a British Columbia
corporation; and G&R CEDAR LTD., a
British Columbia corporation,

Defendants.

CASE NO. 2:19-cv-00451-RSM

DECLARATION OF KEITH S.
DUBANEVICH RE RESELLER
INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
APPOINTMENT OF INTERIM CO-
LEAD CLASS COUNSEL AND
LIAISON COUNSEL

I, KEITH S. DUBANEVICH, declare under penalty of perjury of the laws of the State of Oregon that the following statements are true and correct and based upon my personal knowledge:

1. I am an attorney licensed to practice in Oregon and Texas. I have been admitted *pro hac vice* to practice before this Court in this case.

2. I am a shareholder of Stoll Stoll Berne Lokting & Shlachter P.C. ("Stoll Berne"). I obtained my B.S degree from Northeastern University with high honors in 1980, and my J.D. degree from Tulane University School of Law, *cum laude*, in 1983.

1 3. I joined Stoll Berne in September 2012 after practicing for approximately 29 years,
2 first as an associate and then as a partner, at Fulbright & Jaworski (now Norton Rose Fulbright),
3 an international law firm where my practice focused on litigation. During my time with Fulbright
4 & Jaworski, I handled numerous antitrust cases and tried an antitrust case to a verdict. In 1998 I
5 joined Garvey Schubert Barer in the Portland office as a shareholder. During my time with Garvey
6 Schubert Barer I was lead counsel in the defense of numerous class action antitrust cases including
7 *In re Parcel Tanker Shipping Services Antitrust Litig.*, 3:04-cv-1687-AVC (D. Ct.) and *In re Puerto*
8 *Rican Cabotage Antitrust Litig.*, 3:08-md-1960-DRD (D. P. R.). In November 2008 I was
9 appointed Special Counsel to the Oregon Attorney General and was eventually promoted to Chief
10 of Staff and Associate Attorney General. During my time with the Oregon Department of Justice
12 I supervised numerous antitrust cases including antitrust reviews of corporate mergers and
13 acquisitions and prosecution of price fixing cases. I joined Stoll Berne in 2012. I have been on
14 the Executive Committee of the Antitrust Section of the Oregon State Bar since 2015 and served
15 as Chair of the Section from 2017-2018.

16 4. On March 27, 2019, my client, Plaintiff Fraser Construction Company, Inc.
17 (“Plaintiff”), filed the first—and thus far only—Reseller Indirect Purchaser Plaintiff class action
18 complaint in the nation alleging that Defendants and their co-conspirators colluded to fix the prices
19 of cedar shakes and shingles in violation of federal antitrust law as well as the antitrust and
20 consumer protection laws of numerous states. *See Fraser Construction Co., Inc. v. Cedar Shake &*
21 *Shingle Bureau, et al.*, No. 2:19-cv-00451 (W.D. Wash. Mar. 27, 2019), Class Action Complaint
22 (Dkt. #1) (“Complaint”) at ¶ 4.

23 5. Stoll Berne has performed considerable work, and expended significant time and
24 resources, to identify and investigate—as well as meaningfully further—the claims in this
25 litigation. The firm’s work began with a thorough review of the complaint and temporary
26 restraining order papers filed earlier this year by S&W Forest Products, where allegations of
27 collusion in the cedar shake and shingles industry first came to light. In the ensuing days and
28 weeks, the firm undertook considerable investigation of the industry and claims at issue before

1 filing suit for their client. The firm conducted an extensive review of publicly available information
2 concerning the products at issue, relevant industry characteristics, the manufacturers (including
3 Defendants and their co-conspirators), the industry trade association, and the distribution chain.
4 The firm also spoke with numerous industry participants about market characteristics, observed
5 pricing trends, and the core allegations. The firm also retained, at its own expense, an experienced
6 economics consulting firm to evaluate relevant available industry pricing, cost and demand data
7 to help inform their assessment of the existence and impact of any collusion that may have
8 occurred. This economic assessment, showcased prominently in the complaint, reveals that pricing
9 for the relevant products has increased significantly since at least January 2011 and that these
10 increases cannot be explained by ordinary market forces.

12 6. Stoll Berne has both defended and prosecuted antitrust cases through trial in
13 numerous federal and state courts across the country. The firm's antitrust experience ranges from
14 defending hospitals in exclusionary conduct cases to prosecuting price-fixing and market
15 allocation matters as well as a recent case which alleged tying and unlawful bundling of cable
16 television services. Stoll Berne also has a diverse class action practice which includes securities,
17 antitrust, and consumer cases in which cases the firm has been appointed lead, co-lead or liaison
18 counsel. Stoll Berne's litigation and class action practices are rated Tier One in Portland, Oregon
19 and we are consistently ranked in Chambers USA, Best Lawyers, and Oregon Super Lawyers.

20 7. I am the Stoll Berne attorney who will lead the firm's litigation work. I have been
21 lead, liaison and co-lead counsel in numerous significant cases including: *A. F. ex rel Legaard v*
22 *Providence Health Plan*, No. 3:13-cv-00776-SI (D. Or.) (lead counsel in consumer class action
23 brought on behalf of children with autism); *In re: Premera Blue Cross Customer Data Security*
24 *Breach Litig.*, 3:15-md-2633-SI (D. Or.) (liaison counsel in consumer data breach class action); *In*
25 *re: CenturyLink Sales Practices and Securities Litig.*, 17-md-02795-MJD-KMM (D. Minn.) (co-
26 lead counsel in federal securities case). In my prior private practice I defended multi-district
27 antitrust cases including: *In re Parcel Tanker Shipping Services Antitrust Litig.*, 3:04-cv-1687-AVC
28 (D. Ct.) and *In re Puerto Rican Cabotage Antitrust Litig.*, 3:08-md-1960-DRD (D. P. R.).

1 8. I have been admitted to practice in over a dozen U.S. District Courts, and I have
2 handled appeals in the Second, Fifth and Ninth Circuit Courts of Appeal as well as in the United
3 States Supreme Court. I am currently a member of the Oregon Law Commission and I was recently
4 recognized as a Litigation Star by Benchmark Litigation. I have been consistently rated AV* by
5 Martindale Hubbell and I am ranked by both The Best Lawyers in America and Oregon Super
6 Lawyers.

7 9. Stoll Berne has the resources to commit to the prosecution of this action. With 18
8 lawyers and decades of combined experience successfully funding and litigating complex class
9 actions, my firm has the track record to back up this commitment. Indeed, our firm had a lead role
10 in litigating the plaintiffs' claims arising out of the Exxon Valdez oil spill, which litigation lasted
12 over a decade.

13 10. I and my firm have worked cooperatively with the proposed interim co-lead counsel
14 for the End User Indirect Purchaser Plaintiff classes in other complex litigation and class actions.
15 For example, Stoll Berne and Keller Rohrback are working together representing the State of
16 Oregon in *Oregon v. Monsanto Company, et al*, No. 18-cv-00540 (Multnomah County Oregon
17 Circuit Court), and Stoll Berne and Lockridge Grindal are working together in *In re: Premera Blue*
18 *Cross Customer Data Security Breach Litig.*, 3:15-md-2633-SI (D. Or.) and *In re: CenturyLink*
19 *Sales Practices and Securities Litig.*, 17-md-02795-MJD-KMM (D. Minn.). Stoll Berne and Burns
20 Charest are also working with counsel for end user ZRD Group LLC prosecuting *Kjessler v.*
21 *Zaappaaz, Inc., et al.*, No. 18-CV-00430 (S.D. Tex.).

22 11. Based on my experience dealing with the proposed End User co-lead counsel in
23 this litigation thus far, I fully intend to carry on this tradition here. For instance, we already have
24 begun discussing ways to coordinate our efforts to maximize the efficient and successful
25 prosecution of our respective classes' claims on matters of shared interest.

26 12. Stoll Berne is committed to managing this litigation efficiently and economically,
27 and I and the other lawyers who will work on this case intend to use our experience and background
28 in similar cases to streamline the litigation. *First*, the firm is well-versed in using case management

1 strategies to focus litigation with an eye on getting the best result possible without spending a
2 fortune. If appointed, the firm will implement a timekeeping and cost reporting protocol that will
3 require all Reseller plaintiffs' counsel to maintain a daily record of their time and expenses incurred
4 in connection with this litigation and provide monthly reports for review by the firms. Should the
5 Court request it, the firm will provide *in camera* submissions of time records for the Court's
6 review. *Second*, the firm will take measures of the kind used in its other cases to ensure that this
7 litigation is prosecuted leanly yet effectively. For example, it will ensure that each assignment is
8 sufficiently but not overly staffed, that state-of-the art technology (like technology assisted review
9 and predictive coding) is implemented to streamline document discovery, that certain tasks like
10 document review have reasonable hourly rate caps, and that a core group of lawyers as opposed to
12 a small army will be responsible for making all major decisions on behalf of the proposed classes.

13 13. Stoll Berne's commitment to utilizing technology to streamline litigation is
14 demonstrated by our cutting-edge technology and e-discovery program. Our team of information
15 system professionals combines experience and knowledge to manage our clients' data securely and
16 efficiently. We believe cost shouldn't prevent our clients from receiving the best service possible,
17 so whether we're representing an individual with a small amount of information or working in
18 large-scale class actions or bet-the-company litigation, we leverage technology to give our clients
19 the most effective, cost-efficient tools available.

20 14. Stoll Berne employs a nimble and dedicated team with the expertise needed to guide
21 and support our clients through the entire litigation process. We have the ability to perform, in-
22 house, everything from remote collection of electronically stored information, to hosting and
23 managing large-scale shared workspaces, to helping craft and deliver trial presentations.

24 15. Stoll Berne partners with Relativity, locally hosting our clients' data in our own
25 secure environment. Our information systems and litigation support teams are led by Matthew
26 Clover, Angel Falconer, and Wes Mueller. In 2017, Mr. Mueller received a Certified Relativity
27 User certificate.

16. Attached hereto as Exhibit A are true and correct copies of excerpts from the Stoll Berne website, including information about the firm, its antitrust and class action practice, and my individual biography.

DATED this 8th day of April, 2019, at Portland, Oregon.

Kedh S Dhanech

Keith S. Dubanevich

Email: kdubanevich@stollberne.com

EXHIBIT A

EXHIBIT A



Stoll Berne

A BELIEF IN SOCIAL RESPONSIBILITY

Stoll Berne gives back to its community. Every year, the firm donates a generous percentage of gross revenues to charitable causes. We are a major contributor to the Lawyers' Campaign for Equal Justice, which provides legal services funding to low-income Oregonians. Many of our lawyers donate their time to pro bono legal work, including representing seniors, indigent clients and migrant workers. Our community partners include Self Enhancement, Inc., Community Cycling Center, Ronald McDonald House of Oregon and Southwest Washington, Hoyt Arboretum Friends, CASA, Hands on Portland and Oregon Food Bank. We also participate in charitable fundraising and coach high school mock trial teams.

PERSONAL INTEGRITY AND PROFESSIONAL EXCELLENCE

Our attorneys are selected for their personal integrity, sound judgment and superior academic achievement. Many of our lawyers finished at or near the top of their class at the nation's premier law schools, and continue to receive professional honors and accolades. We are consistently peer-rated as among the best lawyers in Oregon, and frequently cited for our publishing in professional journals. Our lawyers are regularly invited to professional speaking engagements.

A PRACTICAL ATTITUDE TOWARD PREVENTING AND RESOLVING DISPUTES

Stoll Berne represents individuals, small and large corporations, financial institutions, and government entities. Our clients, from individuals and closely held corporations to Fortune 500 companies, all have one thing in common – they seek exceptional legal representation. By choosing to concentrate our practice on focused areas of expertise, we offer our clients the opportunity for continued success.

KEY PRACTICE AREAS:

Securities/Investor/Broker Litigation

We regularly represent plaintiffs/claimants and defendants/respondents in cases involving stocks, bonds, limited partnerships and other investment vehicles, disputes between stockbrokers and customers (e.g., misrepresentation and suitability claims), and claims for management malfeasance at the expense of shareholders or investors. Our clients include both individual and institutional investors, as well as defendants, in financial fraud class actions.

Business Litigation

Whether our clients initiate or are defendants in litigation, we aggressively represent them to obtain the best results. We are regularly retained in “bet the company” litigation and are experienced in state and federal courts and arbitrations. Our clients turn to us for assistance with a variety of business matters such as contract, breach of fiduciary duty, fraud, real estate, employment and professional malpractice disputes.

Class Action Litigation

We have represented many types of class members in a variety of class actions including: employees in wage and hour class actions; businesses damaged by environmental spills; health care providers and the disabled in class actions for reimbursement of health care costs; investors in securities fraud class actions; and consumers in cases involving improper fees, deception, and price fixing.



Real Estate Law

Our real estate lawyers regularly represent clients in the purchase and sale of real estate, real estate financings (including mezzanine loans), development of real property, development incentives, capital formation (including private placements and joint venture equity arrangements), leasing, tax-deferred property exchanges, affordable housing, condominiums, and disposition and development agreements with local municipalities.

Patent/Trademark/Intellectual Property Litigation

We represent parties in all aspects of intellectual property litigation, including disputes involving patents, trademarks, trade secrets, copyrights, false advertising, unfair competition, defamation and medical research practice. We are frequently consulted by patent and trademark counsel when litigation develops and often are asked to serve as trial counsel.

Business Transactions/Corporate Law

We represent and advise clients on business formations, capital formation, financing, licensing, leasing, executive compensation, employment law, corporate governance, business succession planning, equity owner retirements, tax planning and regulatory compliance.

Antitrust and Unfair Trade Practices

We represent U.S. and international companies and consumers in all aspects of antitrust litigation. Our antitrust experience includes trials in state and federal court and in arbitration. We have litigated cases involving allegations of price-fixing, customer allocation, market division, price discrimination, tying or bundling related products, and unfair or deceptive trade practices.

Learn more about our areas of practice at
stollberne.com

WHO WE ARE

Deeply rooted in the Northwest and nationally recognized for over 35 years, Stoll Berne has produced extraordinary results through practical, strategic and tenacious representation. We are proud that more than half of our client list originates from referrals by satisfied clients and peers. We keep our firm small in order to provide efficient services in specialized areas in which we have significant experience.





CONTACT US



209 Southwest Oak Street • Suite 500
Portland, Oregon 97204



Tel (503) 227-1600



stollberne.com

Antitrust Litigation

Stoll Berne represents national and international companies and consumers in all aspects of antitrust litigation, including, allegations of:

- Price-fixing
- Customer allocation
- Market division
- Price discrimination
- Tying or bundling related products
- Unfair or deceptive trade practices

Our team of experienced, highly sophisticated trial attorneys handles everything from complex class actions to multi-district litigation and arbitration. Because we have represented both plaintiffs and defendants in antitrust cases, this experience has enabled us to garner respect among members of the bench and bar as objective and practical antitrust litigators.



From Price-Fixing to Monopolistic Practices, We Handle All Aspects of Antitrust Litigation



Our Proven Track Record

We have defended health care providers against antitrust claims. Indeed, we have tried to a successful verdict an antitrust case against a major national hospital chain and won multiple summary judgment motions and motions to dismiss. These cases have arisen out of peer review proceedings, preferred provider agreements, and most favored nation clauses.

We have represented Japanese and American shipping companies in multi-district litigation and in arbitration against price-fixing and market allocation allegations. We have defended healthcare companies against exclusive dealing allegations.

Currently, we are prosecuting a class action in federal court against automotive wire harness manufacturers. The class action arises out of an alleged long-running conspiracy of rigging bids for and fixing, raising, maintaining, and stabilizing prices of automotive wire harnesses used in automobiles sold in the United States.



Cody Berne

Attorney



Timothy DeJong

Attorney



Keith Dubanevich

Attorney



Keith Ketterling

Managing Attorney



Steve Larson

Attorney



Yoona Park

Attorney



Class Actions

We have earned our reputation as the leading plaintiffs' class actions firm in Oregon. We have litigated securities fraud class actions on behalf of investors. We have represented employees in class actions involving wage and hour claims. We have represented consumers in consumer protection class actions and in antitrust cases. We have represented injured people and businesses in environmental class actions. We have also represented health care providers seeking to recover proper reimbursement in class actions against insurance companies. Our class actions practice fights to level the playing field and find justice.



Protecting Your Rights is Our Business

To learn more about us and our class actions practice, please watch the video to the left.

To visit our [Class Actions Blog](#), click [here](#). If you would like to receive emails with our latest blog posts, you may sign up directly on the blog or simply send us an email via our [Contact Us](#) page with the request.

Stoll Berne

Exceptional lawyers | Extraordinary results

We Amplify Your Voice When You Feel Voiceless



Tell us about your case

Please contact us for a no-cost, no-obligation, strictly confidential consultation.

Get Started

Class Actions Attorneys



Lydia Anderson-Dana

Attorney



Steven Berman

Attorney



Cody Berne

Attorney



Gary Berne

Attorney & Founder



Nadia Dahab

Attorney



Timothy DeJong

Attorney



Keith Dubanevich

Attorney



Keith Ketterling

Managing Attorney



Steve Larson

Attorney



Keil Mueller

Attorney



Yoona Park

Attorney



Joshua Ross

Managing Attorney



Jen Wagner

Attorney

Keith Dubanevich Attorney

Telephone: (503) 227-1600
Direct: (503) 972-7120
Fax: (503) 227-6840
209 SW Oak Street, Suite 500
Portland, Oregon 97204
✉ kdubanevich@stollberne.com



Keith is an accomplished trial, appellate, and healthcare lawyer with over 30 years of experience in more than a dozen different jurisdictions around the country. With a focus on complex dispute resolution, with particular emphasis in the healthcare industry, Keith is adept at handling multi-state and international antitrust cases, consumer litigation, and securities disputes. In healthcare, he has handled peer review disputes, partnership and incorporation matters, and billing investigations. Keith has led internal investigations for public entities as well as for not-for-profit organizations.

Keith's clients value his keen instincts in court and his ability to delve into complex legal issues while never losing sight of the overall strategy of a case. During his time at the Oregon Department of Justice as Associate Attorney General and Chief of Staff, Keith led the creation of a civil rights unit, managed securities litigation including multiple cases against financial services companies, and supervised antitrust investigations and prosecutions. He was also involved with the adoption of legislation that expanded the Unlawful Trade Practices Act and legislation that imposed a mediation requirement prior to non-judicial foreclosures.

PRACTICE AREAS

Antitrust Litigation • Appellate • Business Litigation • Class Actions • Elections & Government Law • Healthcare Litigation • Internal Investigations • Lawyer, Accountant & Professional Malpractice • Securities Litigation

EDUCATION

Tulane University School of Law, J.D., *cum laude*, 1983
Moot Court Board
Louisiana Trial Lawyers Award for Outstanding Advocacy
Order of the Barristers

Northeastern University, B.S., Public Administration, with high honors, 1980

A.A. White Dispute Resolution Center, Mediation Certificate, 1997

ADMITTED TO PRACTICE

Oregon State Bar, 1998

Texas State Bar, 1983

U.S. District Court, Oregon

U.S. District Court, Connecticut

U.S. District Court, Northern Florida

U.S. District Court, Southern New York

U.S. District Court, Southern Texas

U.S. District Court, Eastern Texas

U.S. District Court, Western Wisconsin

U.S. Court of Appeals, Second Circuit

U.S. Court of Appeals, Fifth Circuit

U.S. Court of Appeals, Ninth Circuit

U.S. Supreme Court

Massachusetts, 1990 (Inactive)

PROFESSIONAL EXPERIENCE

Stoll Berne

Shareholder, 2012-present

Oregon Department of Justice

Associate Attorney General and Chief of Staff, 2012-2012

Chief of Staff and Special Counsel, 2009-2012

Special Counsel, 2009

Garvey Schubert Barer

Shareholder, 1998-2008

Fulbright & Jaworski L.L.P. (Houston, Texas)

Partner, 1992-1998

Associate, 1983-1988, 1989-1992

Hale & Dorr (Boston, Massachusetts)

Associate, 1988-1989

PROFESSIONAL ACTIVITIES

Oregon Law Commission

Commissioner, 2016-present

Oregon State Bar

Antitrust and Trade Regulation Section Executive Committee, Chair, 2018; Chair-elect, 2017; 2015-present
Business Litigation Section Executive Committee, 2002-2009; Chair, 2008; Chair-elect, 2007; Treasurer, 2007;
Secretary, 2006

American Bar Association

Antitrust and Litigation Sections, Member

Owen M. Panner American Inn of Court

Master, 1998-2017

COMMUNITY ACTIVITIES

Mazamas Mountaineering Association

Board of Directors, Chair, 2007

Hoyt Arboretum Friends

Board of Directors, 2012-2017; President, 2013-2017

PRESENTATIONS

- "Proportionality in Practice," Oregon State Bar Business Litigation Section CLE, Portland, Oregon (September 2017)
- "Oregon Public Employee Retirement Fund v. Marsh & McLennan: Lessons Learned," Oregon State Bar Business Litigation Section CLE, Portland, Oregon (May 2017)
- "Telephone Consumer Protection Act," Oregon Trial Lawyers Association, Portland, Oregon (May 2014)
- "US Supreme Court Update: Chadbourne & Parke v. Troice; Mississippi v. Au Optronics; and Halliburton v. Erica John Fund. What's changed and what's coming up next session," Oregon State Bar Securities Regulation Section CLE, Portland, Oregon, (June 2014)

PUBLICATIONS

- "Presidential Tweets, Yelp Reviews, FREE BOOZY, and Admissibility," OSB Litigation Journal (Fall 2017)
- "Class Arbitration: Permissible? Preventable? Who Gets to Decide?" 26 Oregon State Bar Litigation Journal 3 (2007)
- "Jurisdiction: In Personam and In Rem," 1 Oregon Civil Pleading and Practice Chapter 2 (2006)
- "Personal Jurisdiction in a Virtual World," Texas Bar Journal, February 2003
- "A Brief Introduction to Product Liability Law in the United States," China Chamber of Commerce for Machinery and Electronics News Report, 3rd Issue, 2002
- "Minimizing Exposure – Personal Jurisdiction in the Silicon Forest," 62 Oregon State Bar Bulletin 21 (December 2001)
- "You Can Advertise, But Don't Sell That Product: Virtual Jurisdiction in Washington," Washington Law Journal, June 2001
- "Personal Jurisdiction in the Silicon Forest," Oregon Law Journal, June 2001
- "Health Care Litigation and Confidentiality – Unique Discovery Issues," Oregon Health Law (Summer 2000)
- "State by State Guide to Managed Care Law," Oregon, Aspen Publishing (1999, 2000, 2001)
- "Qui Tam Suits," Oregon Health Law (Winter, 1998/1999)
- "Whistle-Blower Reward Programs Signal the Need to Accelerate Compliance Efforts," Patient Accounts, Healthcare Financial Management Association (August 1998)

PERSONAL

Keith is an avid runner, skier, and cyclist. In his spare time, he enjoys cooking with his wife and family.

AWARDS

Benchmark Litigation
Litigation Star & Local Litigation Star, 2015-2018

Martindale Hubbell
AV* Rated

Oregon Super Lawyers
2006-2009; 2014-2018

The Best Lawyers in America®
2014-2019

UNITED STATES DISTRICT COURT
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FRASER CONSTRUCTION COMPANY,
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CEDAR SHAKE & SHINGLE BUREAU, a
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British Columbia corporation,,

Defendants.

No. 2:19-cv-00451-RSM

DECLARATION OF SERVICE

I hereby certify that on April 8, 2019, I electronically filed the foregoing with the
Clerk of the Court using the CM/ECF System which will send notification of such filing
to the following:

Gregory Hollon:	ghollon@mcnaul.com
Will Thompson:	wthompson@burnscharest.com
Spencer Cox:	scox@burnscharest.com
Christopher Cormier:	ccormier@burnscharest.com
Warren Burns:	wburns@burnscharest.com

DECLARATION OF SERVICE
(Cause No. 2:19-cv-00451-RSM)

LAW OFFICES OF
MCNAUL EBEL NAWROT & HELGREN PLLC
600 University Street, Suite 2700
Seattle, Washington 98101-3143
(206) 467-1816

Attorneys for Plaintiff Fraser Construction Company, Inc.
and the Proposed Classes

Further, I hereby certify that I have sent courtesy copies to counsel for defendants
in the related cases:

Larry Steven Gangnes
LANE POWELL PC
1420 Fifth Ave., Ste. 4200
Seattle, WA 9811109402
E: gangnesl@lanepowell.com

Jacob Alejandro Zuniga (Lead)
STOKES LAWRENCE
1420 Fifth Ave., Ste. 3000
Seattle, WA 98101-2393
E: Jacob.zuniga@stokeslaw.com

Heidi Brooks Bradley
Lane Powell PC
E: bradleyh@lanepowell.com

Matthew L. Harrington
STOKES LAWRENCE
E: mlh@stokeslaw.com

Molly A. Terwilliger
YARMUTH LLP
1420 5th Ave., Ste. 1400
Seattle, WA 98101
E: mterwilliger@yarmuth.com

DATED this 9th day of April, 2019.

By: s/ Gregory J. Hollon
Gregory J. Hollon, WSBA No. 26311

DECLARATION OF SERVICE
(Cause No. 2:19-cv-00451-RSM)

LAW OFFICES OF
MCNAUL EBEL NAWROT & HELGREN PLLC
600 University Street, Suite 2700
Seattle, Washington 98101-3143
(206) 467-1816